

**REDACTED**

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Attorneys for Defendant  
WPIX, Inc.

UNITED STATES DISTRICT OF NEW YORK  
SOUTHERN DISTRICT OF NEW YORK

----- X	
KAREN SCOTT,	:
	:
Plaintiff,	:
	:
-against-	:
	:
WPIX, INC.,	:
	:
Defendant.	:
	:
----- X	

10-CIV-4622 (WHP)

**DECLARATION OF EDWARD CERASIA II, ESQ.**

I, EDWARD CERASIA II, declare under the penalty of perjury:

1. I am a partner with the law firm Seyfarth Shaw LLP, attorneys for defendant WPIX, Inc. ("WPIX") in the above-captioned action. I submit this Declaration, which is based upon personal knowledge, in support of the WPIX's motion for summary judgment.

2. Appended to this Declaration as **Exhibit A** is a true and correct copy of each of the following pages from the deposition transcript of plaintiff Karen Scott: 10, 12, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 29, 30, 31, 34, 35, 36, 40, 45, 47, 48, 49, 53, 54, 55, 56, 57, 59, 60, 61, 64, 65, 66, 67, 69, 70, 72, 76, 77, 78, 79, 82, 83, 84, 85, 90, 91, 92, 99, 100, 109, 110, 112, 113, 114, 116, 117, 118, 119, 120, 122, 123, 125, 126, 127, 128, 129, 130, 131, 132, 133, 135, 136,

137, 138, 140, 141, 143, 144, 145, 146, 147, 148, 149, 151, 152, 155, 156, 160, 161, 163, 164, 165, 168, 175, 176, 177, 178, 179, 180, 182, 183, 184, 185, 186, 187, 190, 191, 192, 194, 196, 198, 199, 200, 203, 204, 207, 209, 210, 211, 212, 213, 215, 216, 217, 218, 220, 221, 222, 227, 228, 232, 233, 234, 235, 236, 237, 238, 239, 241, 245, 247, 249, 250, 251, 252, 253, 254, 255, 257, 258, 260, 261, 262, 264, 265, 266, 267, 270, 272, 273, 274, 275, 276, 277, 278, 280, 281, 284, 285, 286, 287, 288, 292, 293.

3. Appended to this Declaration as **Exhibit B** is a true and correct copy of each of the following Exhibits from Ms. Scott's deposition: Exhibit 2, Exhibit 3, Exhibit 4, Exhibit 5, Exhibit 7, Exhibit 8, Exhibit 9, Exhibit 10, Exhibit 11, Exhibit 12, Exhibit 13, Exhibit 14, Exhibit 15, Exhibit 16, Exhibit 17, Exhibit 18, Exhibit 19, Exhibit 20, Exhibit 21, Exhibit 22, Exhibit 23, Exhibit 24, Exhibit 25, Exhibit 26, Exhibit 27, Exhibit 28, Exhibit 29, Exhibit 30, and Exhibit 31.

4. Appended to this Declaration as **Exhibit C** is a true and correct copy of each of the following pages from the deposition transcript of Betty Ellen Berlamino: 7, 8, 12, 13, 14, 18, 19, 20, 21, 23, 24, 25, 26, 28, 29, 30, 32, 38, 41, 44, 45, 47, 48, 49, 50, 51, 52, 59, 66, 73, 74, 89, 91, 96, 102, 128, 134, 137, 138, 141, 146, 147, 152, 153, 154, 156, 157, 158, 161, 163, 164, 165, 169, 174, 175, 182, 183, 186, 187, 189, 191, 192, 205, 210, 211, 212, 213, 223, 227, 228, 229, 230, 231, 232, 235, 236, 242, 252, 253, 254, 257, 258, 260, 262, 277, 278, 279, 280, 281, 282, 283, 284, 286, 287, 288, 289, 292, 305, 306, 365, 366, 368.

5. Appended to this Declaration as **Exhibit D** is a true and correct copy of each of the following Exhibits from Ms. Berlamino's deposition: Exhibit 7, Exhibit 9, Exhibit 14, and Exhibit 34.

6. Appended to this Declaration as **Exhibit E** is a true and correct copy of each of the following pages from the deposition transcript of Jean Maye: 7, 15, 16, 23, 40, 41, 42, 45,

46, 48, 50, 51, 53, 79.

7. Appended to this Declaration as **Exhibit F** is a true and correct copy of each of the following pages from the deposition transcript of Steven Charlier: 6, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 25, 27, 28, 29, 30, 31, 32, 35, 36, 37, 38, 39, 41, 42, 44, 45, 46, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 62, 64, 65, 66, 67, 68, 69, 74, 75, 77, 78, 79, 80, 89, 98, 99, 100, 114 .

8. Appended to this Declaration as **Exhibit G** is a true and correct copy of each of the following pages from the deposition transcript of Myrna Ramirez: 7, 10, 13, 14, 16, 17, 18, 19, 24, 25, 29, 32, 34, 35, 38, 39, 40, 42, 48, 68, 69, 78, 85, 86, 92, 99, 100, 104, 106.

9. Appended to this Declaration as **Exhibit H** is a true and correct copy of each of the following pages from the deposition transcript of Marvin Scott: 6, 7, 9, 15, 23, 25, 32, 33, 41, 42.

10. Appended to this Declaration as **Exhibit I** is a true and correct copy of each of the following pages from the deposition transcript of Kaity Tong: 11, 12, 13, 17, 18, 20, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44, 45, 49, 58, 60, 61, 70, 71.

11. Appended to this Declaration as **Exhibit J** is a true and correct copy of an email from Ms. Berlamino to Ms. Scott dated November 15, 2004, Subject: over-all concern regarding news numbers, Bates-stamped WPIX000094.

12. Appended to this Declaration as **Exhibit K** are true and correct copies of emails from Ms. Berlamino to Ms. Scott, Bates-stamped WPIX000101, WPIX000108, WPIX000109, WPIX000111, WPIX000112, WPIX000113-114, WPIX000116, WPIX000133, WPIX000137, WPIX000150, WPIX000155, and WPIX000160.

13. Appended to this Declaration as **Exhibit L** is a true and correct copy of an email

from Ms. Berlamino to Ms. Scott, John Houseman and Tim Armstrong dated December 12, 2008, Subject: third place, Bates-stamped WPIX000180.

14. Appended to this Declaration as **Exhibit M** is a true and correct copy of an email from Ms. Berlamino to John Seminerio and Ms. Scott dated February 17, 2009, Subject: Growing our 10pm News Product, Bates-stamped WPIX000189.

15. Appended to this Declaration as **Exhibit N** are true and correct copies of March 2009 emails from Ms. Berlamino to Ms. Scott, Bates-stamped WPIX000191, WPIX000192, and WPIX000193.

16. Appended to this Declaration as **Exhibit O** are true and correct copies of April 2009 emails from Ms. Berlamino to Ms. Scott, Bates-stamped WPIX000230, WPIX000231, WPIX000232, WPIX000233, WPIX000234, and WPIX000235.

17. Appended to this Declaration as **Exhibit P** are true and correct copies of June and July 2009 emails from Ms. Berlamino, Bates-stamped WPIX000245, WPIX000251, WPIX000253, WPIX000261, and WPIX000280.

18. Appended to this Declaration as **Exhibit Q** is a true and correct copy of a Tribune Expense Report for Mr. Charlier dated July 20, 2009, Bates-stamped WPIX006809-10.

19. Appended to this Declaration as **Exhibit R** are true and correct copies of emails regarding issues between Emily Frances and Amy Growick, Bates-stamped WPIX000302, WPIX000303, WPIX000304, WPIX000305, WPIX000306, WPIX000307, WPIX000309, WPIX000310, WPIX000311, and WPIX000312-13.

20. Appended to this Declaration as **Exhibit S** are true and correct copies of emails from Ms. Berlamino to Ms. Scott regarding issues between Ms. Frances and Ms. Growick, Bates-stamped WPIX000268-70, and WPIX000281-84.

21. Appended to this Declaration as **Exhibit T** are true and correct copies of emails between Ms. Berlamino and Ms. Scott dated August 4, 2009, Bates-stamped WPIX000297, and WPIX000315-16.

22. Appended to this Declaration as **Exhibit U** is a true and correct copy of an email from Ms. Berlamino and Ms. Scott dated August 10, 2009, Subject: Weekend news, Bates-stamped WPIX000322.

23. Appended to this Declaration as **Exhibit V** are true and correct copies of emails from Ms. Berlamino to Ms. Scott dated August 17 and 18, 2009, Bates-stamped WPIX000326, and WPIX000331.

24. Appended to this Declaration as **Exhibit W** is a true and correct copy of *Bawa v. Brookhaven Nat'l Lab.* No. 95-CIV-2472 (LDW), slip op. at 15 (E.D.N.Y. Oct 15, 1997).

25. Appended to this Declaration as **Exhibit X** is a true and correct copy of Plaintiff's Complaint and Jury Demand, filed on June 14, 2010.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Date Executed: August 12, 2011

s/ Edward Cerasia II  
Edward Cerasia II